

Guzzo, Lindsay

From: Shawn Stokes <sstokes@TridentSeafoods.com>
Sent: Thursday, October 08, 2015 8:34 PM
To: Guzzo, Lindsay
Cc: envcompliance; Joe Plesha
Subject: Comments Regarding Draft Oregon/Washington Seafood GP
Attachments: removed.txt

Dear Lindsay Guzzo. Please find comments from Trident Seafoods Corporation regarding the Draft Offshore Seafood Processing General Permit off the Coasts of Oregon and Washington.

General comment.

Trident Seafoods would like to express appreciation for the contents and conditions of the draft permit that provide for environmental protection while allowing for economical seafood processing activity off the coasts of Washington and Oregon.

IV.A Submittal of a Notice of Intent

Please confirm that if an approved eNOI system becomes available during the time period of the permit that an eNOI will satisfy the "Permittee... must submit... an updated and amended NOI when there is any material change" as required in part IV.A.3

IV.C.5.d

By-product is a seafood material that has value and can be converted into a finished product. By-product should not be labeled as "waste product" until it is sent to the waste treatment system for discharge. It is requested that IV.C.5.d be changed to "The design capacity of the quantity (in pounds) of raw or by-product that can be processed in by-product recovery lines in a 24-hour day;"

IV.6.a

Grinders are used to treat the seafood processing waste solids not wastewater. See part V.A.1. Please change the description to keep consistency through the permit.

IV.6.d

It is requested that this section be clarified to more clearly separate the processing systems of the raw and by-products and the treatment system of the seafood processing waste solids. The following suggested language is provided.

Process Flow Diagram or Schematic. Provide a diagram or schematic showing the processes of the processing facility, including by-product recovery processes and the seafood waste treatment system. Also provide a water balance showing all processing units or treatment units, including disinfection (e.g, chlorination and dechlorination). The water balance must show daily average flow rates at influent points and discharge points and approximate daily flow rates between processing units, by-product processing units and seafood waste treatment units. Include a brief narrative description of the diagram.

Line drawing. A line drawing of the water flow through the facility with a water balance, showing operations that contribute waste/wastewater to the effluent and treatment units. Similar processes, operations, or production areas may be indicated as a single unit, labeled to correspond to more detailed identification.

The third paragraph of section “d” includes a narrative identification of the various contributing streams to an outfall, including stormwater run-off. Would “deck runoff” be a more appropriate term “Deck Runoff” means the precipitation, washdowns, and seawater falling on the weather deck of a vessel and discharged overboard through deck openings (2013 VGP definition).” If directed to an outfall?

V.A.5

Please edit “treatment process” to “by-product recovery processes” to maintain consistency through the permit. See Parts IV.C.5.d and VI.B.2.c.4.

VI.B.2.c.4

Please edit to be more consistent with the other permit parts that discuss by-product recovery and waste utilization. The following suggestion is provided. “Type and amount of by-product (pounds) utilized through a by-product recovery line (if available), such as fishmeal or fish oil per month. If by-product is not utilized through an available by-product recovery line, explain why.”

VI.B.5

Please clarify that if an approved electronic reporting system becomes available during the time period of the permit, that the Annual Report (and any required additional submittals) could be submitted via the approved electronic system and satisfy the reporting requirement.

Thank you for the opportunity to comment on the draft permit. Feel free to contact me if there are any questions regarding the comments.



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